

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

Portland DIVISION

Tyler Scott

(Enter full name of plaintiff)

Plaintiff,

v.

Civil Case No. 3:25-cv-00706-SI  
(to be assigned by Clerk's Office)

COMPLAINT FOR VIOLATION OF CIVIL  
RIGHTS (PRISONER COMPLAINT)

Clackamas County,  
Clackamas County Sheriff  
Brandon Burg, c/o John Doe,

Jury Trial Demanded

☒ Yes

☐ No

c/o John Doe, c/o John Doe

(Enter full name of ALL defendant(s))

Defendant(s).

I. PARTIES

List your name, address, and telephone number below, and the same information for each defendant. Make sure that the defendant(s) listed below are identical to those contained in the caption of the complaint. Attach additional sheets of paper if necessary.

Plaintiff

Name: Tyler Scott

Street Address: 11540 NE Inverness Dr

City, State & Zip Code: Portland, OR 97220

Telephone No.: \_\_\_\_\_

**Defendant No. 1**

Name: Clackamas County  
Street Address: \_\_\_\_\_  
City, State & Zip Code: \_\_\_\_\_  
Telephone No.: \_\_\_\_\_

**Defendant No. 2**

Name: Clackamas County Sheriff  
Brandon ~~burg~~ Burg  
Street Address: unknown  
City, State & Zip Code: \_\_\_\_\_  
Telephone No.: \_\_\_\_\_

**Defendant No. 3**

Name: 40 John Doe X 3  
Street Address: \_\_\_\_\_  
City, State & Zip Code: \_\_\_\_\_  
Telephone No.: \_\_\_\_\_

**Defendant No. 4**

Name: \_\_\_\_\_  
Street Address: \_\_\_\_\_  
City, State & Zip Code: \_\_\_\_\_  
Telephone No.: \_\_\_\_\_

**II. BASIS FOR JURISDICTION**

Under 42 U.S.C. § 1983, you may sue state or local officials for the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." Under *Bivens v. Six Unknown Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. You are bringing suit against (*check all that apply*):

☐ Federal officials (a *Bivens* claim)

☒ State or local officials (a § 1983 claim)

B. What federal constitutional, statutory, or treaty right(s) is/are at issue?

Fourteenth amendment right to due process

### III. STATEMENT OF CLAIMS

#### Claim I

*State here as briefly as possible the facts of your case. Describe how each defendant was involved, when the conduct occurred, and any injuries you have suffered as a result. It is not necessary to give any legal arguments or cite any cases or statutes.*

See attached

#### Claim II

*State here as briefly as possible the facts of your case. Describe how each defendant was involved, when the conduct occurred, and any injuries you have suffered as a result. It is not necessary to give any legal arguments or cite any cases or statutes.*

N/A

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**Claim III**

*State here as briefly as possible the facts of your case. Describe how each defendant was involved, when the conduct occurred, and any injuries you have suffered as a result. It is not necessary to give any legal arguments or cite any cases or statutes.*

N/A

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*(If you have additional claims, describe them on another piece of paper, using the same outline.)*

#### IV. EXHAUSTION OF ADMINISTRATIVE REMEDIES

I have filed for administrative relief as to all claims in Section III and have concluded all administrative appeals available to me.

☒ Yes

☐ No

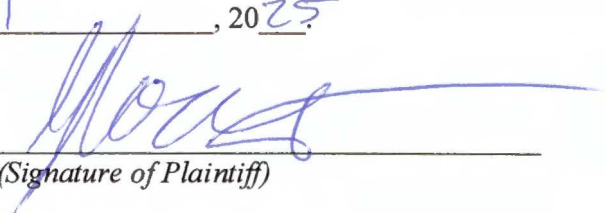
#### V. RELIEF

*State briefly exactly what you want the court to do for you and the amount, if any, of monetary compensation you are seeking. Make no legal arguments. Cite no cases or statutes.*

see attached

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 20th day of April, 2025.

  
(Signature of Plaintiff)



FILED 28 APR '25 10:42 USDC-ORP

Tyler Scott  
Plaintiff

V.

Complaint  
Attachment

Clackamas County,  
Clackamas county  
Sheriff ~~3~~ Brandon burg  
C/o John Doe, C/o  
John Doe, C/o John Doe  
Defendants

Civil action No. \_\_\_\_\_

1

At all times relevant to this case, Plaintiff Tyler Scott was in the custody of clackamas county sheriffs office.

2

On 6/30/23 Plaintiff Scott was booked into clackamas county Jail for allegedly shooting 2 clackamas county police officers.

3

Immediately after entering booking, Defendant's John Doe, John Doe, John Doe, (3 ~~Defendants~~ C/o's names unknown) came rushing at plaintiff Scott screaming quit resisting, and threw punches hitting plaintiff Scott in the



- 3 Face, head, neck, and body while screaming "This is what you get for shooting cops." Plaintiff was cuffed behind back
- 4 The Defendants body slammed plaintiff 2 times, punched him all over too many times to count, Defendants used their knees to hit his kidneys and body.
- 5 This brutal, malicious and sadistic attack was unprovoked. The plaintiff was cooperative the entire process once in custody and handcuffed whole time
- 6 This attack caused unnecessary and wanton infliction of pain and was not justified
- 7 The Defendants made no efforts to use as little force as necessary. The entire attack, Plaintiff was non-combative and stating "I'm not resisting" and "I'm already cuffed".
- 8 This incident was on camera and footage will support this complaint



9

After being assaulted by defendants, Plaintiff was in a lot of pain. His whole body, head, and face hurt and later was bruised.

10

After the assault took place, Defendants pretended to try to put Plaintiff Scott in a restraint chair. During this process, Defendants punched Scott in the jaw, kidneys, and stomach acting like they were trying to get him to bend over as a false pretense, All while saying "this is what happens when you shoot cops."

11

After assaulting Scott in the restraint chair, Defendants took him out of chair and ~~put~~ restrained him in a "le point restraint system" where he was cuffed to the ground arms and legs spread apart like a "Breaking Wheel" torture technique.

12

Defendants left Plaintiff Scott restrained in this "le Point restraint system for over 8 hours. The cuffs were so tight his hands turned purple and lost feeling.



13

After 6 hours of being restrained, Defendants came into cell and slammed plaintiff scott to the ground with a shield while he was still in the 6 point restraint. At that point they finally loosened the cuffs ~~at~~ upon medicals request.

14

There is a camera in this cell where plaintiff was restrained and this assault took place.

15

The plaintiff was kept in booking for 8 days.

16

The Judge signed a order having plaintiff remanded to Multnomah County for his safety, because of the assault that happened at booking explained herein.



## Legal Claims

17

Plaintiff realleges and incorporate by reference paragraphs 1-16

18

Defendants used excessive Force against Plaintiff Scott by assaulting in booking as described on line 3-9. Defendants actions Violated Plaintiff Scotts rights under the Fourteenth amendment right to due process as a pre trial detainee and caused Plaintiff pain, suffering, physical injury and emotional distress.

19

Defendants used excessive Force against Plaintiff Scott by placing him in 6 point restraint system For 8 hours as described on line 10-14. Defendants action Violated Plaintiff Scotts rights under the Fourteenth amendment right to due process as a pre trial detainee and caused plaintiff pain, suffering, physical injury and emotional distress.

20

Plaintiff Scott has no plain, adequate, or complete remedy at law to redress the wrongs described herein. Plaintiff has been and will continue to be irreparably injured by the conduct of the defendants unless the court grants declaratory and injunctive relief which plaintiff seeks pg 5/7



## Relief

WHEREFORE, plaintiff respectfully pray that this court enter Judgment;

21 Granting Plaintiff Scott a declaration that the acts and omissions described herein violate his rights under the Constitution and laws of the United States, and

22 A preliminary and permanent injunction ordering defendants to cease their physical violence and threats toward Plaintiff Scott, and

23 Granting Plaintiff Scott compensatory damages in the amount of \$750,000.00 against each defendant jointly and severally

24 Plaintiff also seeks a jury trial on all issues triable by jury

25 Plaintiff also seeks to recover their costs in this suit, and



26

Any additional relief this court deems  
Just, proper, and equitable.

### Verification

I have read the foregoing complaint and  
hereby verify that the matters alleged  
therein are true, except as to matters alleged  
on information and belief, and, as to those, I  
believe them to be true. I certify under  
penalty of perjury that the foregoing  
is true and correct.

Executed at Portland, Oregon on 4/20/25

Respectfully Submitted,

x 

Tyler Scott #722706  
11540 NE Inverness Dr  
Portland, OR 97220



**CERTIFICATE**

(To be completed by the institution of incarceration.)

I certify that Tyler Scott (name of applicant) has the sum of \$ -1.24  
on account to his/her credit at Mult. Co. Detention Ctr (name of institution). I  
further certify that during the past six months the applicant's average monthly balance was \$ -44.95.  
I further certify that during the past six months the average of monthly deposits to the applicant's account  
was \$ 72.50.

**I have attached a certified copy of the applicant's trust account statement showing the transactions  
for the past six months.**

04/22/25  
DATE

Lisa Han # 93458  
SIGNATURE OF AUTHORIZED OFFICER

11540 NE INVERNESS DR  
PORTLAND, OR 97220  
2.87

FIRST CLASS



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